

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
INTERFERENCE SHOWING INVOLVING KMGH AND KTSC
PROPOSED DTV STATION KMGH-DT
DENVER, COLORADO
CH 7 37.4 KW (MAX-DA) 295 M

Technical Narrative

Station KTSC is a non-commercial, educational (NCE) television station licensed (BLET-20010111ABS) for NTSC operation on channel 8 at Pueblo, Colorado. It has a maximum directional effective radiated power (ERP) of 234 kilowatts and an antenna radiation center height above average terrain (HAAT) of 720 meters. It is also authorized by construction permit (BPEDT-20000501AGQ) to operate on DTV channel 26 with a maximum directional ERP of 1000 kilowatts and an HAAT of 699 meters. KTSC has elected its NTSC channel (8) for its post transition operation.

Station KMGH is licensed (BLCT-19970805KM) for NTSC operation on channel 7 at Denver, Colorado with a non-directional ERP of 316 kilowatts and an HAAT of 310 meters. It is also authorized by construction permit (BMPCT-20000421AAV) to operate on DTV channel 17 with a maximum directional ERP of 1000 kW and an HAAT of 295 meters. KMGH has also elected its NTSC channel (7) for its post transition operation.

It is believed the FCC employed the following parameters for the elected post transition facilities of stations KMGH and KTSC to prepare their interference analysis.

Call Sign	Channel	ERP (kW)	RCAMSL (m)	HAAT (m)	Antenna
KMGH	7	37.4	2304	295	DA
KTSC	8	20.32	2964	727	DA

Both stations received conflict letters as each station is predicted to cause interference to each other in excess of the 0.1% limit.

Figure 1 is a map displaying the 36 dBu noise-limited coverage contour for the proposed KTSC operation on DTV channel 8,

along with the predicted points of unique interference it is predicted to receive from KMGH. Based on the FCC's interference calculations, the proposed KMGH digital operation is predicted to cause unique interference to 463,772 persons within the KTSC service population which amounts to 33.45% of the FCC's baseline of 1,386,408. All of the KMGH interference cells are located outside of KTSC's designated market area (DMA), Colorado Springs-Pueblo. Also shown on Figure 1 are the noise-limited contours of other authorized or licensed DTV stations that provide service in the area predicated to receive interference. Figure 1A is a tabulation of the stations providing service. As shown, the area is still well served as the noise limited contours of 13 other DTV stations completely encompass the area predicted to receive service. Three of these DTV stations providing service to the predicted interference area are non-commercial education television stations, including Rocky Mountain's Denver owned and operated television station, KRMA.

Figure 2 is a map displaying the 36 dBu noise-limited coverage contour for the proposed KTSC operation on DTV channel 8, the points of unique interference it is predicted to receive from KMGH, and the 28 dBu noise-limited coverage contour for the elected DTV facility of co-owned station KRMA. As shown, the areas where KTSC is predicted to receive interference is still served by KRMA.

Figure 3 is a map displaying the 36 dBu noise-limited coverage contour for the proposed KMGH operation on DTV channel 7, along with the predicted points of unique interference it is predicted to receive from KTSC. Based on the FCC's interference calculations, the proposed KMGH digital operation is predicted to cause unique interference to 38,160 persons within the KMGH service population which amounts to 1.3% of the FCC's baseline of 2,937,365. All of the KTSC interference cells are located outside of KMGH'S designated market area (DMA), Denver. Also shown on Figure 3 are the noise-limited contours of other authorized or licensed DTV stations that provide service in the area predicated to receive interference. Figure 2A is a tabulation of the stations providing service. As shown, the area is still well served as the noise limited contours of 10 other DTV stations completely encompass the area predicted to receive service.

Figure 4 is a map displaying the licensed NTSC and proposed DTV coverage contours for station KTSC, if it is successful in electing to Channel 8. Shown by the blue symbols are the existing interference and terrain limited points within KTSC's NTSC Grade B contour. The red symbols are where KMGH-DT operating on Channel 7 would create unique interference to KTSC-DT operating on Channel 8 and where KTSC currently provides analog Grade B service not affected by terrain and/or interference.¹ Therefore, these points represent a population of 18,200 persons that have current NTSC service from KTSC and would subsequently receive interference once KTSC and KMGH operate in DTV mode.

Figure 5 is a map displaying the authorized NTSC and proposed DTV coverage contours for station KMGH, if it is successful in electing to Channel 7. Shown by the blue symbols are the existing interference and terrain limited points within KMGH's NTSC Grade B contour. The red symbols are where KTSC-DT operating on Channel 8 would create unique interference to KMGH-DT operating on Channel 7 and where KMGH currently provides analog Grade B service not affected by terrain and/or interference. Therefore, these points represent a population of 7,850 persons that have current NTSC service from KTSC and would subsequently receive interference once KMGH and KTSC operate in DTV mode.

The cumulative interference KMGH is predicted to receive post transition was calculated. Based on our analysis KMGH is predicted to receive interference to 59,805 persons, which is 2.0% of the calculated post transition baseline of 2,956,719. The cumulative interference KTSC is predicted to receive is 1,167,552 persons, which is 56.47% of the calculated post transition baseline of 2,067,568.

Finally, it is noted that the proposed KMGH site also meets the minimum separation requirement with respect to first adjacent station KTSC. The KMGH site located 114 kilometers away

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. An Alpha based processor computer system was employed.

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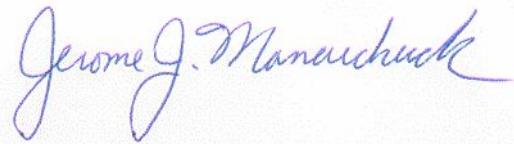
Consulting Engineers

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from the KTSC site. The separation requirement for first adjacent VHF DTV stations operating in Zone 2 are no allotments permitted between 23 and 110 kilometers. Thus, the KMGH site exceeds the minimum separation requirement to KTSC by 4 kilometers.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.

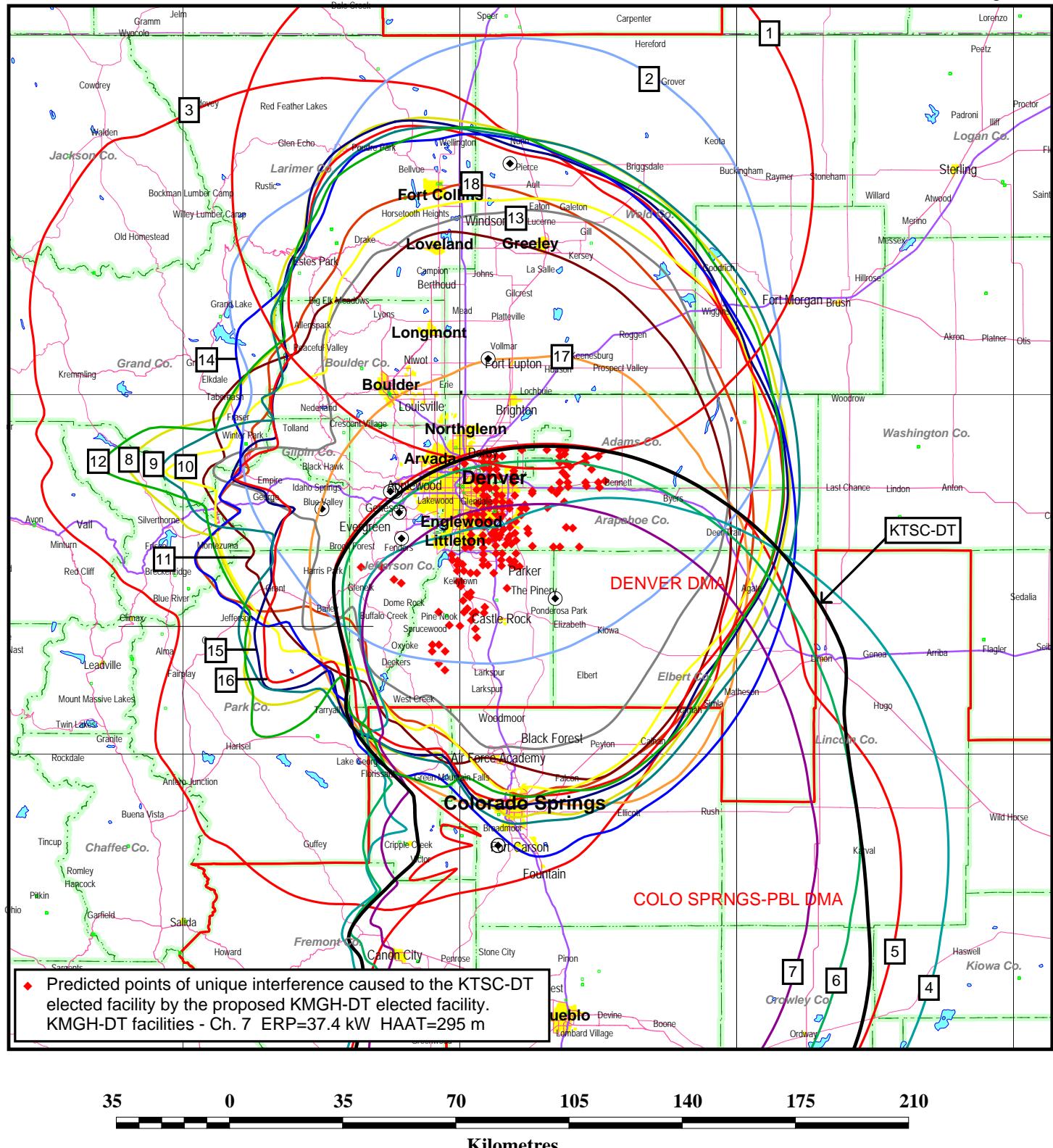


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August 15, 2005

Figure 1



AUTHORIZED DTV STATIONS PROVIDING SERVICE TO KTSC-DT INTERFERENCE AREA

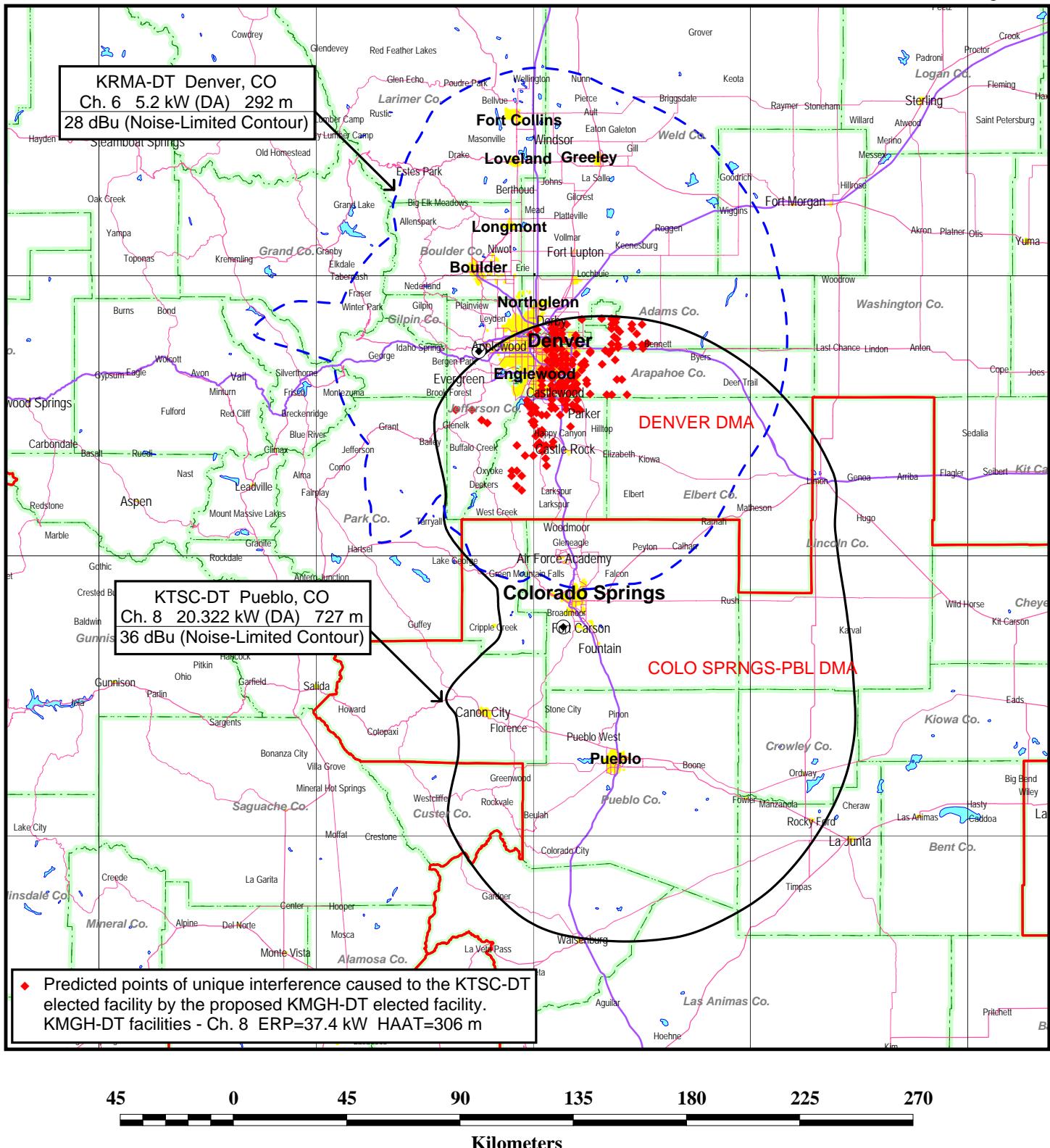
DENVER, COLORADO

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

FIGURE 1A

	Station	Channel	LICENSED COMMUNITY	FILE ARN
1	KFCT	22	FORT COLLINS, CO	(BMPCDT-20040618AD)
2	KDEN	29	LONGMONT, CO	(BMPCDT-20040524AO)
3	KBDI	38	BROOMFIELD, CO	(BPEDT-20000428ACX)
4	KOAA	42	PUEBLO, CO	(BPCDT-19991029AG)
5	KKTV	10	COLORADO SPRINGS, CO	(BLCDT-20030512ADQ)
6	KRDO	24	COLORADO SPRINGS, CO	(BMPCDT-20050408AB)
7	KXRM	22	COLORADO SPRINGS, CO	(BLCDT-20030702ABE)
8	KWGN	34	DENVER, CO	(BPCDT-19991029AH)
9	KCNC	35	DENVER, CO	(BMPCDT-20000501ADD)
10	KCEC	51	DENVER, CO	(BPCDT-19991029ACN)
11	KRMT	40	DENVER, CO	(BPEDT-20000501AHN)
12	KRMA	18	DENVER, CO	(BMPEDT-20030728AJU)
13	KDVR	32	DENVER, CO	(BLCDT-19991101ADA)
14	KPXC	43	DENVER, CO	(BPCDT-19990923AA)
15	KUSA	16	DENVER, CO	(BMPCDT-20000501ADN)
16	KTVD	19	DENVER, CO	(BMPCDT-19981231KE)
17	KWHD	46	CASTLE ROCK, CO	(BPCDT-19991005AB)
18	KTFD	15	BOULDER, CO	(BMPCDT-20040624ACV)

Figure 2

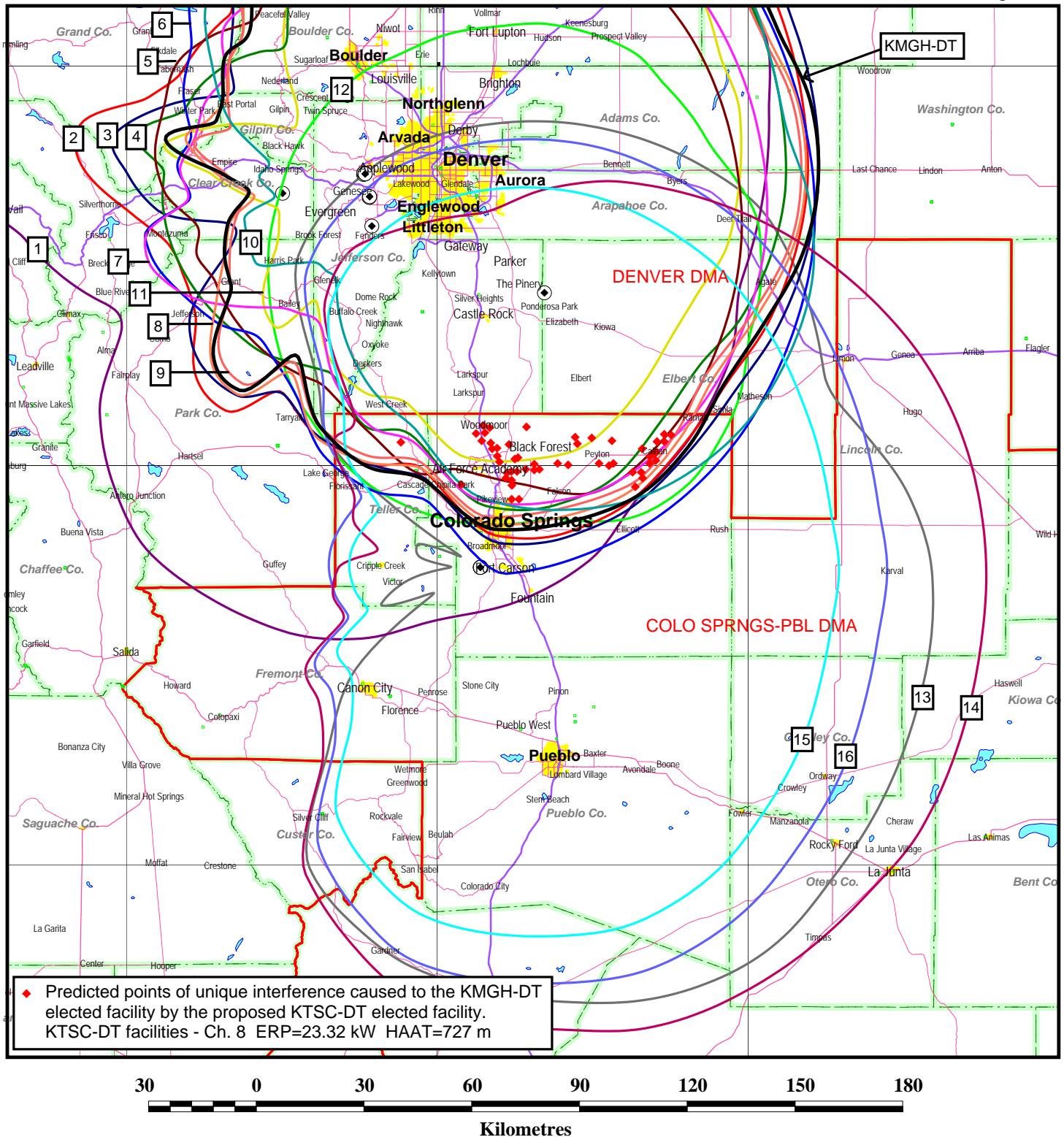


PREDICTED INTERFERENCE FROM KMGH-DT ELECTED FACILITY TO THE KTSC-DT ELECTED FACILITY

DTV STATION KTSC-DT
PUEBLO, COLORADO
CH 8 20.322 KW 727 M

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Figure 3



AUTHORIZED DTV STATIONS PROVIDING SERVICE TO KMGH-DT INTERFERENCE AREA

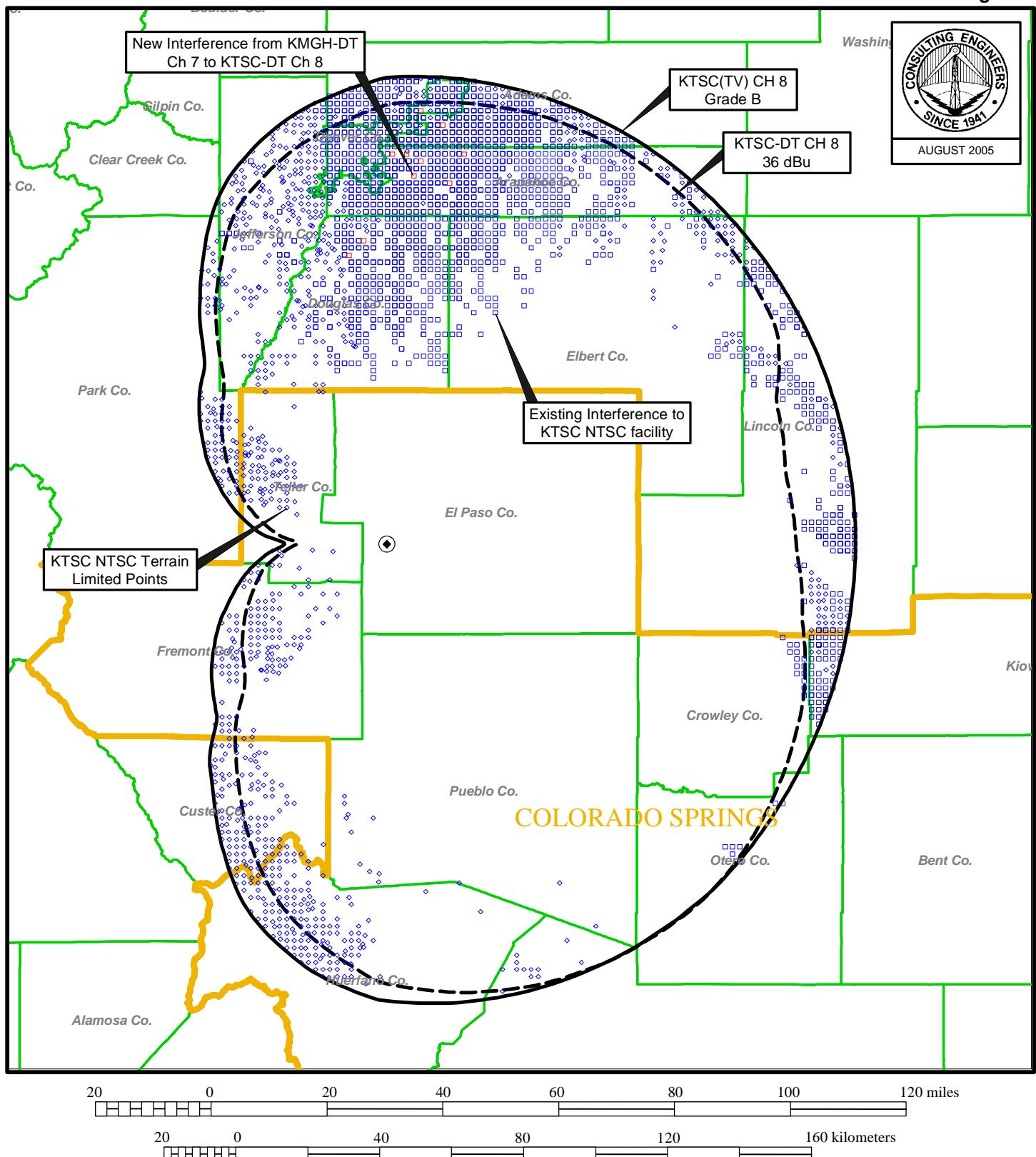
COLORADO SPRINGS, COLORADO

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

FIGURE 3A

	Station	Channel	LICENSED COMMUNITY	FILE ARN
1	KBDI	38	BROOMFIELD, CO	(BPEDT-20000428ACX)
2	KWGN	34	DENVER, CO	(BPCDT-19991029AH)
3	KCNC	35	DENVER, CO	(BMPCDT-20000501ADD)
4	KCEC	51	DENVER, CO	(BPCDT-19991029ACN)
5	KRMT	40	DENVER, CO	(BPEDT-20000501AHN)
6	KPXC	43	DENVER, CO	(BPCDT-19990923AA)
7	KTFD	15	BOULDER, CO	(BMPCDT-20040624ACV)
8	KUSA	16	DENVER, CO	(BMPCDT-20000501ADN)
9	KTVD	19	DENVER, CO	(BMPCDT-19981231KE)
10	KRMA	18	DENVER, CO	(BMPEDT-20030728AJU)
11	KDVR	32	DENVER, CO	(BLCDT-19991101ADA)
12	KWHD	46	CASTLE ROCK, CO	(BPCDT-19991005AB)
13	KKTV	10	COLORADO SPRINGS, CO	(BLCDT-20030512ADQ)
14	KOAA	42	PUEBLO, CO	(BPCDT-19991029AG)
15	KXRM	22	COLORADO SPRINGS, CO	(BLCDT-20030702ABE)
16	KRDO	24	COLORADO SPRINGS, CO	(BMPCDT-20050408AB)

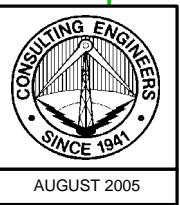
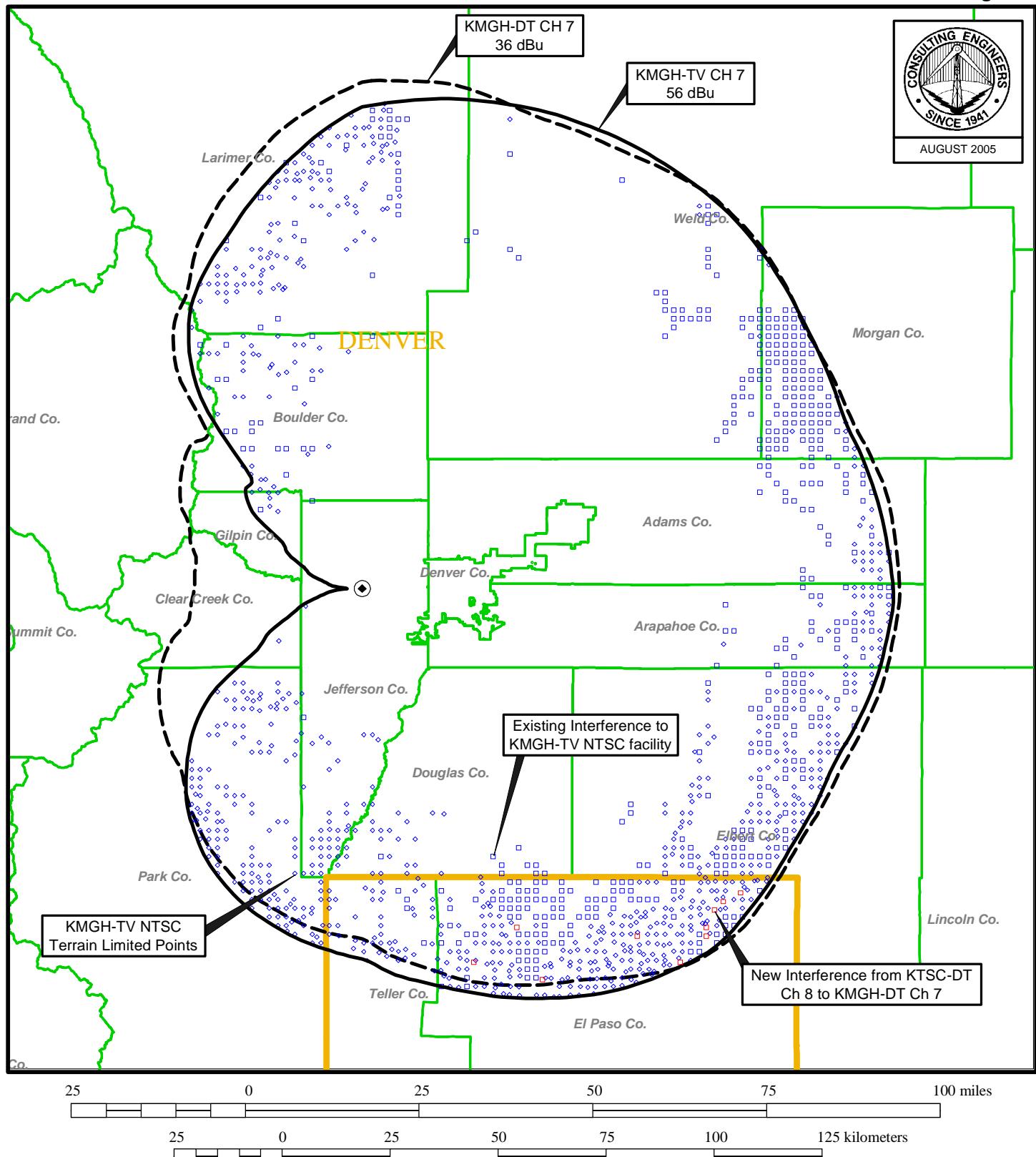
Figure 4



PREDICTED KTSC SERVICE

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Figure 5



PREDICTED KMGH-DT SERVICE

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